

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

Motion Day: TBD

**NOTICE OF MOTION TO  
COMPEL INSPECTION OF DR.  
WILLIAM LONGO'S  
LABORATORY**

**ORAL ARGUMENT REQUESTED**

PLEASE TAKE NOTICE that on a date to be determined by the parties and the Court, the undersigned counsel, pursuant to Federal Rule of Civil Procedure 34(a)(2), will bring Defendants Johnson & Johnson and LLT Management LLC ("Defendants")'s Motion to Compel Inspection of William Longo's Laboratory before this Court. Defendants will ask for entry of an order compelling Plaintiffs to make the following available for inspection:

1. All PLM microscopes used by MAS at 3945 Lakefield Ct, Suwanee, GA 30024 for its analysis of the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024);
2. MAS's methodology for preparing the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024) for subsequent analysis by PLM for the identification of

“chrysotile,” including but not limited to observing in real time the preparation of one or more samples of Johnsons Baby Powder performed by MAS; and

3. MAS’s methodology for analyzing the materials referenced in Defendants’ Requests for Production Nos. 20-24 (dated April 18, 2024) for analysis by PLM for the identification of “chrysotile,” including but not limited to observing in real time the analyses performed by MAS on the samples of Johnsons Baby Powder, as well as Defendants’ experts undertaking real time, contemporaneous observation of the samples on the same PLM equipment used by MAS in which MAS has previously reported, and may during the inspection report, observing “chrysotile.”

Defendants request that oral argument be held in connection with this motion.

Dated: May 21, 2024

Respectfully submitted,

/s/ Susan M. Sharko  
Susan M. Sharko

**FAEGRE DRINKER BIDDLE &  
REATH LLP**

Attorneys for Defendants Johnson &  
Johnson and LLT Management, LLC